

FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SEVEN NETWORKS, LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 2:17-cv-442-JRG

LEAD CASE

**FILED UNDER SEAL PURSUANT
TO PROTECTIVE ORDER**

SEVEN NETWORKS, LLC,

Plaintiff,

v.

**SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA,
INC.**

Defendants.

Civil Action No. 2:17-cv-441-JRG

CONSOLIDATED CASE

**DECLARATION OF LINDSAY COOPER IN SUPPORT OF GOOGLE LLC'S
MOTIONS *IN LIMINE***

I, Lindsay Cooper, declare as follows:

1. I am an attorney at the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendant Google LLC ("Google") in this matter. I submit this declaration in support of Defendant Google's Motions *in Limine*.

2. I have personal knowledge of the facts stated herein and if called to testify could and would competently testify thereto.

3. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the Expert Report of Brian W. Napper.

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4. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the June 1, 2018 motion hearing in this case.

5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the September 6, 2018 deposition of Donna Miasel.

6. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the August 29, 2018 deposition of Colby Adams.

7. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the August 29, 2018 deposition of Dustin Morgan.

8. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the August 30, 2018 deposition of Barton Day.

9. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the August 29, 2018 deposition of Chastity Rhodes.

10. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from SEVEN's First Supplemental Objections and Responses to Defendants' First Set of Common Interrogatories.

11. Attached hereto as Exhibit 9 is a true and correct copy of Exhibit B to SEVEN's First Supplemental Objections and Responses to Defendants' First Set of Common Interrogatories.

12. Attached hereto as Exhibit 10 is a true and correct copy of excerpts from the August 30, 2018 deposition of Ari Backholm.

13. Attached hereto as Exhibit 11 is a true and correct copy of excerpts from the October 20, 2018 deposition of Michael T. Goodrich, PHD.

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14. Attached hereto as Exhibit 12 is a true and correct copy of excerpts from the Report of Michael T. Goodrich, PHD Regarding Validity of the '019, '600, '127 and '129 Patents.

15. Attached hereto as Exhibit 13 is a true and correct copy of excerpts from the Dr. Goodrich's Turnbull Rebuttal Appendix.

16. Attached hereto as Exhibit 14 is a true and correct copy of excerpts from SEVEN's Objections and Responses to Defendants' First Set of Common Interrogatories.

17. Attached hereto as Exhibit 15 is a true and correct copy of excerpts from the October 19, 2018 deposition of Michael T. Goodrich, PHD.

18. Attached hereto as Exhibit 16 is a true and correct copy of excerpts from the October 10, 2018 deposition of Brian Napper.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed November 27, 2018 in San Francisco, California.

/s/ *Lindsay Cooper*
Lindsay Cooper